

Hi Cristin,

Thank you for the phone call earlier and for giving us the opportunity to share Courtesy Ford's side of the story regarding the DOJ voluntary compliance settlement.

In November 2018 Courtesy Ford resolved certain allegations being investigated by the Oregon Department of Justice that related to sales of certain products, including vehicle theft deterrent product known as "Data Dots", certain Ford Raptors and Demonstrator vehicles being sold as New.

The settlement is a matter of record with no admittance of wrong doing and an assurance of voluntary compliance. In Courtesy Ford's 35 year history and over 100,000 customers we have always done what was best for our customers and this settlement is no different.

1. Data Dots:

Courtesy Ford sold a theft protection called DATA DOTS.

The DOJ brought to our attention that the product shared the same letters as department of transportation (DOT) and that this could have been confusing to customers. We only intended to offer our clients a level of protection. We agreed to offer refunds to certain customers who were Oregon Residents at the time of purchase and who purchased DATA DOTS product unknowingly.

We also immediately insured that all theft products were clearly identified as theft products plus their brand name on purchase orders and contracts to eliminate any confusion and improve transparency.

2. Ford Raptors:

Owing to a mistake by a third-party provider, the MSRP for certain Ford Raptors was overstated on Courtesy Fords website. The vendor did not, or could not get correct mapping showing the MSRP and Market Adjustment so it added them together. Courtesy Ford has communications with vendor prior to the DOJ investigation showing us trying to work with them to get it corrected. We have since terminated our relationship and signed up with a Ford Factory Site to improve pricing disclosures.

As a part of the settlement Courtesy Ford agreed to refund, to affected customers, the difference between the actual MSRP and the amount stated on Courtesy Fords Website.

3. Used Vehicles Sold As New

These were new vehicles that were put into demonstrator service and sold with less than 5000 miles and were never titled. These vehicles qualified for all NEW vehicle rebates and manufacturer incentive programs. The DOJ

believed because these vehicles had miles on them, they should be sold as Used. We have complied with their belief and these vehicles are now sold as Used.